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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRENDA CARMONA-VENEGAS,

Defendant.

CASE NO. 1:20-CR-00044-DAD

STIPULATION TO CONTINUE SENTENCING
DATE; ORDER

DATE: September 13, 2021
TIME: 10:00 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for sentencing on September 13, 2021.
2. By this stipulation, defendant now moves to continue the sentencing until December 6, 2021. As this is a sentencing and a change of plea has already been entered, no exclusion of time under the Speedy Trial Act is required.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for defendant desires additional time to work with defendant in obtaining records and other items in preparation for sentencing.
 - b) Counsel for defendant has also been diligently seeking this information, but defendant now works nights, and given the difficulty in scheduling meetings with defendant in light of her schedule, obtaining the information is taking longer than anticipated and is more

challenging than anticipated.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

IT IS SO STIPULATED.

Dated: August 9, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ LAURA JEAN BERGER
LAURA JEAN BERGER
Assistant United States Attorney

Dated: August 9, 2021

/s/ CHARLES LEE
CHARLES LEE
Counsel for Defendant
BRENDA CARMONA-
VENEGAS

FINDINGS AND ORDER

IT IS SO ORDERED.

Dated: August 9, 2021

Dale A. Ingh
UNITED STATES DISTRICT JUDGE